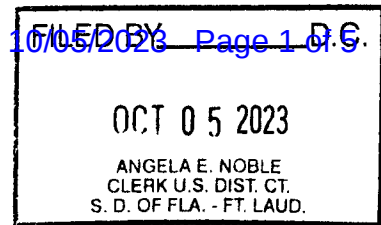


SEALED



UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 23-Cr-60196-Dimitrakis / Augustin-Birch  
18 U.S.C. § 922(a)(6)  
18 U.S.C. § 924(a)(1)(A)  
18 U.S.C. § 922(g)(3)

UNITED STATES OF AMERICA

vs.

ROBERT ZILDJIAN MONDRAGON  
a/k/a "Mors Mortem,"

Defendant.

INDICTMENT

The Grand Jury charges that:

COUNT 1  
**False Statement to a Firearms Dealer**  
**(18 U.S.C. § 922(a)(6))**

On or about June 18, 2019, in Miami-Dade County, in the Southern District of Florida, the defendant,

**ROBERT ZILDJIAN MONDRAGON**  
**a/k/a "Mors Mortem,"**

in connection with the acquisition of a firearm, that is, one (1) Radical Arms, Model FCR, AR-15 style rifle, from a federally licensed firearms dealer, did knowingly make a false and fictitious written statement to the dealer, which statement was intended and likely to deceive the dealer with respect to any fact material to the lawfulness of the sale and other disposition of such firearm, in that, the defendant stated in Bureau of Alcohol, Tobacco, Firearms and Explosives Form 4473 that he was not an unlawful user of marijuana, when in truth and fact, and as the defendant then and there well knew, he was an unlawful user of marijuana, in violation of Title 18, United States Code, Section 922(a)(6).

**COUNT 2**  
**False Statement in Required Information Kept by a Firearms Dealer**  
**(18 U.S.C. § 924(a)(1)(A))**

On or about June 18, 2019, in Miami-Dade County, in the Southern District of Florida, the defendant,

**ROBERT ZILDJIAN MONDRAGON**  
**a/k/a “Mors Mortem,”**

did knowingly make a false statement and representation with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of Glatza Militum, a federally licensed firearms dealer, in that, the defendant stated in Bureau of Alcohol, Tobacco, Firearms, and Explosives Form 4473 that the defendant was not an unlawful user of marijuana, when in truth and fact, and as the defendant then and there well knew, he was an unlawful user of marijuana, in violation of Title 18, United States Code, Section 924(a)(1)(A).

**COUNT 3**  
**Possession of a Firearm by a Convicted Felon**  
**(18 U.S.C. § 922(g)(1))**

On or about November 14, 2021, in Broward County, in the Southern District of Florida, the defendant,

**ROBERT ZILDJIAN MONDRAGON**  
**a/k/a “Mors Mortem,”**

did knowingly possess a firearm in and affecting interstate and foreign commerce, knowing that he was an unlawful user of marijuana, a Schedule I controlled substance, in violation of Title 18, United States Code, Section 922(g)(3).

**FORFEITURE ALLEGATIONS**

1. The allegations of this Information are hereby re-alleged and by this reference fully incorporated herein for the purpose of alleging forfeiture to the United States of America of certain

property in which the defendant, **ROBERT ZILDJIAN MONDRAGON a/k/a "Mors Mortem,"** has an interest.

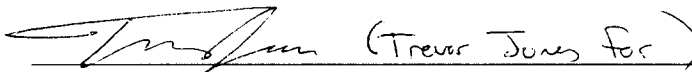
2. Upon conviction of a violation of Title 18, United States Code, Section 922(g), Title 18, United States Code, Section 924(a)(1)(A), or any other criminal law of the United States, as alleged in this Indictment, the defendant shall forfeit to the United States any firearm involved in or used in the commission of such offense, pursuant to Title 18, United States Code, Section 924(d)(1).

All pursuant to Title 18, United States Code, Section 924(d)(1) and the procedures set forth at Title 21, United States Code, Section 853, as incorporated by Title 28, United States Code, Section 2461(c).

A TRUE BILL

FOREPERSON

  
J. VAGUENTI  
MARKENZY LAPOINTE  
UNITED STATES ATTORNEY

 (Trevor Jones for)  
AJAY J. ALEXANDER  
ASSISTANT UNITED STATES ATTORNEY

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

UNITED STATES OF AMERICA

CASE NO.: \_\_\_\_\_

v.

**CERTIFICATE OF TRIAL ATTORNEY**

ROBERT ZILDJIAN MONDRAGON,

\_\_\_\_\_  
Defendant.**Court Division** (select one)

☐ Miami      ☐ Key West      ☐ FTP  
☒ FTL      ☐ WPB

**Superseding Case Information:**

New Defendant(s) (Yes or No) \_\_\_\_\_

Number of New Defendants \_\_\_\_\_

Total number of counts \_\_\_\_\_

I do hereby certify that:

1. I have carefully considered the allegations of the indictment, the number of defendants, the number of probable witnesses and the legal complexities of the Indictment/Information attached hereto.
2. I am aware that the information supplied on this statement will be relied upon by the Judges of this Court in setting their calendars and scheduling criminal trials under the mandate of the Speedy Trial Act, Title 28 U.S.C. §3161.
3. Interpreter: (Yes or No) No  
List language and/or dialect: \_\_\_\_\_
4. This case will take 3 days for the parties to try.
5. Please check appropriate category and type of offense listed below:  
 (Check only one) (Check only one)  
 I ☒ 0 to 5 days      ☐ Petty  
 II ☐ 6 to 10 days      ☐ Minor  
 III ☐ 11 to 20 days      ☐ Misdemeanor  
 IV ☐ 21 to 60 days      ☒ Felony  
 V ☐ 61 days and over
6. Has this case been previously filed in this District Court? (Yes or No) No  
If yes, Judge \_\_\_\_\_ Case No. \_\_\_\_\_
7. Has a complaint been filed in this matter? (Yes or No) No  
If yes, Magistrate Case No. \_\_\_\_\_
8. Does this case relate to a previously filed matter in this District Court? (Yes or No) No  
If yes, Judge \_\_\_\_\_ Case No. \_\_\_\_\_
9. Defendant(s) in federal custody as of \_\_\_\_\_
10. Defendant(s) in state custody as of \_\_\_\_\_
11. Rule 20 from the \_\_\_\_\_ District of \_\_\_\_\_
12. Is this a potential death penalty case? (Yes or No) No
13. Does this case originate from a matter pending in the Northern Region of the U.S. Attorney's Office prior to August 8, 2014 (Mag. Judge Shaniek Maynard? (Yes or No) No
14. Does this case originate from a matter pending in the Central Region of the U.S. Attorney's Office prior to October 3, 2019 (Mag. Judge Jared Strauss? (Yes or No) No
15. Did this matter involve the participation of or consultation with now Magistrate Judge Eduardo I. Sanchez during his tenure at the U.S. Attorney's Office, which concluded on January 22, 2023? No

By: \_\_\_\_\_

AJAY J. ALEXANDER

Assistant United States Attorney

Court ID No. A5502506

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

**Defendant's Name:** ROBERT ZILDJIAN MONDRAGON

**Case No:** \_\_\_\_\_

Count 1:

Material False Statement to Federally Licensed Firearms Dealer

Title 18, United States Code, Section 922(a)(6)

- \* **Max. Term of Imprisonment: 10 Years**
- \* **Mandatory Min. Term of Imprisonment (if applicable): N/A**
- \* **Max. Supervised Release: 3 Years**
- \* **Max. Fine: \$250,000**

Count 2:

False Statement in Records of Federally Licensed Firearms Dealer

Title 18, United States Code, Section 924(a)(1)(A)

- \* **Max. Term of Imprisonment: 5 Years**
- \* **Mandatory Min. Term of Imprisonment (if applicable): N/A**
- \* **Max. Supervised Release: 3 Years**
- \* **Max. Fine: \$250,000**

Count 3:

Possession of a Firearm by an Unlawful User of Marijuana

Title 18, United States Code, Section 922(g)(3)

- \* **Max. Term of Imprisonment: 10 Years**
- \* **Mandatory Min. Term of Imprisonment (if applicable): N/A**
- \* **Max. Supervised Release: 3 Years**
- \* **Max. Fine: \$250,000**

**\*Refers only to possible term of incarceration, supervised release and fines. It does not include restitution, special assessments, parole terms, or forfeitures that may be applicable.**